

SEYFARTH SHAW LLP
Nick C. Geannacopulos (State Bar No. 114822)
ngeannacopulos@seyfarth.com
Michael J. Burns (State Bar No. 172614)
mburns@seyfarth.com
Matthew J. Mason (State Bar No. 271344)
mmason@seyfarth.com
560 Mission Street, Suite 3100
San Francisco, California 94105
Telephone: (415) 397-2823
Facsimile: (415) 397-8549

Attorneys for Defendant
AMERICAN INSTITUTE FOR FOREIGN STUDY, INC.
dba AU PAIR IN AMERICA

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

PENNA PIPER, an individual,)	Case No. C 10 0107 JSW
)	
Plaintiff,)	STIPULATION AND [PROPOSED]
)	ORDER REGARDING DISMISSAL
v.)	
)	
AMERICAN INSTITUTE FOR FOREIGN)	
STUDY, INC. dba AU PAIR IN AMERICA,)	(Marin County Superior Court, Case No.
and DOES 1-10,)	CIV 095805)
)	
Defendant.)	Complaint Filed: November 16, 2009

IT IS HEREBY STIPULATED AND AGREED by and between Penna Piper
("Plaintiff") and American Institute for Foreign Study *dba* Au Pair in America ("Defendant")
(collectively the "Parties") by and through their respective counsel of record:

WHEREAS, on November 16, 2009, Plaintiff filed a complaint in the Superior Court of
California for the County of Orange in the above-captioned matter, alleging causes of action for:
(1) wrongful termination based on disability; (2) disability discrimination; (3) failure to
accommodate a disability; (4) intentional inflictions of emotional distress; (5) negligent infliction
of emotional distress; (6) unfair business practices – violation of Business and Professions Code
§ 17200 *et seq*; (7) unfair business practices – unlawful compensation below minimum wage
requirement; (8) unfair business practice – unlawful compensation – front pay; (9) failure to pay
wages when due; (10) failure to pay overtime; and (11) waiting time penalties;

1 WHEREAS, on January 8, 2010, Defendant removed said State court matter to the
2 United States District Court, Northern District of California;

3 WHEREAS on February 8, 2011, the Parties mediated this case before David Meadows
4 of Mediation and ADR Services and the matter was settled with each party to bear their own
5 attorneys' fees and costs; and

6 WHEREAS, based on the foregoing, Plaintiff has agreed to dismiss with prejudice the
7 entire matter.

8 IT IS HEREBY STIPULATED as follows:

- 9 1. The entire matter is dismissed with prejudice; and
10 2. Each party to bear their own attorneys' fees and costs.

11 DATED: March ___, 2011

SEYFARTH SHAW LLP

13 By /s/ Michael J. Burns
14 Michael J. Burns

15 Attorneys for Defendant
16 AMERICAN INSTITUTE FOR FOREIGN
STUDY, INC. *dba* AU PAIR IN AMERICA

17 DATED: March ___, 2011

LAW OFFICES OF STEVEN KESTEN

18 BY /s/ Steven Kesten
19 Steven Kesten

20 Attorneys for Plaintiff
PENNA PIPER

21 DATED: March ___, 2011

LAW OFFICES OF LAWRENCE A. ORGAN

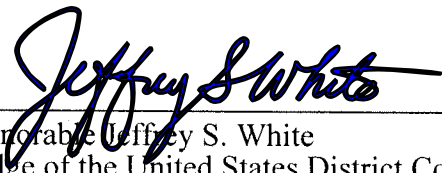
23 BY /s/ Lawrence A. Organ
24 Lawrence A. Organ

25 Attorneys for Plaintiff
26 PENNA PIPER
27
28

ORDER

IT IS SO ORDERED.

Dated: March 23, 2011


Honorable Jeffrey S. White
Judge of the United States District Court
Northern District of California

13201653v.1